

# *Exhibit K*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

TRACY CAEKAERT, and  
CAMILLIA MAPLEY,

Case No.  
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC.,  
WATCH TOWER BIBLE AND  
TRACT SOCIETY OF  
PENNSYLVANIA, and BRUCE  
MAPLEY, SR.,

VIDEOTAPED DEPOSITION  
UPON ORAL EXAMINATION  
OF JAMES ROWLAND

Defendants.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC.,

Cross Claimant,

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and  
JAMIE SCHULZE,

Cause No.  
CV 20-59-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., and  
WATCH TOWER BIBLE AND  
TRACT SOCIETY OF  
PENNSYLVANIA,

Defendants.

**James Rowland**

1           somebody, even though it was just that one person,  
2           no investigation.

3           You have to do something. They can just  
4           say, "Oh, you're lying," or "Well, maybe you'll  
5           have a better day next day," or "Maybe he won't  
6           throw you down anymore and stick his tongue in  
7           you."

8           You've got to investigate it, and because  
9           it's written right there.

10          Q.     Yeah.

11          A.     Otherwise, it wouldn't be in there. If it  
12           was me, I would have taken it right to the legal  
13           department and got a determination. Otherwise, you  
14           wind up like this, getting sued.

15          Q.     Would you have gone to the police if you  
16           felt like you could have?

17          A.     I would have went outside of the  
18           organization. But, see, I believed totally in the  
19           footsteps of Jesus Christ. And on the one hand, I  
20           didn't want to drag Jehovah's name in, because I  
21           knew there was a process for handling this.

22          Q.     The process in this book here, Exhibit 2?

23          A.     Yeah.

24          Q.     Yeah.

25          A.     And secondly, I knew that if I did, and       130

**James Rowland**

1       they did it to me anyhow, I'd have been like an  
2       apostate. But as it was, I was removed from  
3       responsibility and kicked out of the congregation  
4       anyway, without a hearing, without "Boo." The  
5       circuit overseers came out there, and  
6       Brother Miller, "You have to sign this. They  
7       decided against you."

8           Q.     It was when you were disfellowshipped?

9           A.     Kicked out of the congregation and my  
10      responsibilities taken.

11        Q.     Yeah.

12        A.     It was the exact opposite of what I was  
13      trying to do, protect these kids. And a lot of  
14      them are hurt.

15           We've got ex-Witnesses out there in  
16      Lame Deer that are a case in point. One -- both of  
17      them are drug addicts. One was like a whore, and  
18      the other one's in and out of treatment, brother  
19      and sister.

20           The people that abused these kids, they  
21      don't know why it's called death of the soul. It's  
22      because those -- and even my family, they broke us  
23      all up. We had to recover from it. We're still  
24      recovering. They don't know that. Plus they  
25      probably don't give a damn, you know, the

**James Rowland**

1 A. Yes.

2 Q. Okay. And during those phone calls, were  
3 you just honestly and truthfully telling  
4 Mr. Bontecou what you knew and what had happened?

5 A. Yes.

6 Q. Okay.

7 A. It was a brief kind of a summary.

8 Q. Okay. And is it possible that based on  
9 those conversations with Mr. Bontecou, that he  
10 prepared this affidavit?

11 A. Yeah, it -- I think that I did. Maybe  
12 Ariane. Mr. Bontecou wanted it, and I prepared it  
13 and had it notarized and everything.

14 Q. And I assume that you reviewed it before  
15 you signed it. Looks like you signed it on --  
16 well, just a little over a year ago, April 14th,  
17 2020.

18 A. Uh-huh.

19 Q. Did you look at it carefully before you  
20 signed it?

21 A. Did I -- yeah.

22 Q. And is everything here accurate to the  
23 best of your memory?

24 A. To the best of my memory.

25 Q. Yeah, okay. So if we look at paragraph 3,<sub>150</sub>

**James Rowland**

1 it says around 1974 you first started hearing  
2 rumors that Gunner Haines, who was a member of the  
3 congregation, was sexually abusing girls.

4           What do you mean when you say you heard  
5 rumors? What did you hear?

6           A. I heard that from my family that Gunner  
7 had games that he played with them.

8           Q. Okay.

9           A. And it was hide-and-seek. And when he'd  
10 find whoever, he'd molest them.

11          Q. And how sure are you in this 1974 date  
12 you've got here on paragraph 3?

13          A. Yeah, I'd start hearing different things  
14 about then, but it could have even been a little  
15 later than that.

16          Q. Okay.

17          A. And '74 was a date that I was appointed as  
18 an elder, and people started coming and telling me  
19 things, you know.

20          Q. I see.

21          A. Because they trusted me, I guess.

22          Q. Yeah. Okay.

23          A. And I don't know if they went to any of  
24 the -- any other elders, but they would tell me,  
25 and then on the occasion where I have written up

**James Rowland**

1       their -- at elders' meetings, I would bring this  
2       up, and it didn't go anywhere.

3           Q.     You say on paragraph 3 -- and I think  
4       everybody understands, just so you know, that it's  
5       so long ago that we're not going to hold you to  
6       specific dates, you know, right? It could be '75  
7       perhaps. Who knows.

8           A.     Right.

9           Q.     You say here again on paragraph 3 that you  
10      brought the subject up with the elders. What you  
11      heard about Gunner Haines, you brought that up with  
12      the elders sometime around 1974.

13          A.     Uh-huh.

14          Q.     Does that seem right to you as you sit  
15      here today? Does that seem accurate?

16          A.     Seemed pretty accurate.

17          Q.     And what did you tell the elders,  
18      specifically, if you can recall, at that time in  
19      1974?

20          A.     What did I tell the elders?

21          Q.     What did you tell them?

22          A.     It was probably sometime after that. And  
23      I knew Ariane wasn't lying to me. And when she  
24      told me about that, we discontinued going there to  
25      their house and discontinued any babysitting

**James Rowland**

1 guardian of your children?

2 A. No.

3 Q. You've always continuously from age --  
4 from birth to age 18 been their legal guardian?

5 A. Yes.

6 Q. And how would your children get to the  
7 Svensen home? Would you take them? Would your  
8 wife take -- how would they get there?

9 A. What children?

10 Q. Your children, Jamie and Ariane.

11 A. Oh, yeah, I and my wife took care of them.

12 Q. And would you transport them over to the  
13 Svensens' house for babysitting?

14 A. We both did. And sometimes my oldest  
15 daughter would help out.

16 Q. Before we go further in the complaint,  
17 when did you first become aware that Bruce Mapley  
18 had been accused of misconduct involving children?

19 A. It was probably in the late seventies.

20 Q. In the late seventies. Okay.

21 And when did you first become aware that  
22 Harold Rimby had been abusing children? Was that  
23 also in the late seventies?

24 A. Yes.

25 Q. Let me ask you some basic questions,